

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STATE OF ILLINOIS,	Plaintiff,
v.	
CITY OF CHICAGO,	Defendant.

Case No. 17-cv-6260
Judge Robert M. Dow Jr.

JOINT MOTION FOR CLARIFICATION OF AGREED CONFIDENTIALITY ORDER

The Parties jointly move the Court to enter an order confirming the scope of the Agreed Confidentiality Order in this case (“Confidentiality Order”) (Dkt. 31), consistent with Federal Rule of Evidence 502(d). In support thereof, the Parties state as follows:

1. On January 31, 2019, the Court granted the Parties’ joint motion to approve the Consent Decree. (Dkt. 702). On March 1, 2019, the Court appointed Ms. Maggie Hickey as the Monitor under the terms of the Consent Decree. (Dkt. 713). On April 1, 2019, the Court appointed the Honorable David Coar as a Special Master in the case. (Dkt. 725).

2. Prior to the approval of the Consent Decree, the Court entered the Confidentiality Order to protect sensitive confidential information “produced or adduced in the course of discovery.” (Dkt. 31, ¶ 1).

3. The Parties anticipate responding to requests from the Monitor and her team, or individuals or entities working for her team (collectively, “the Monitor”), by producing documents and Electronically Stored Information (“ESI”) to the Monitor covered by the terms of the Confidentiality Order. Similarly, the Parties anticipate responding to requests from the Special Master.

4. Implementing and demonstrating compliance with the terms of the Consent Decree will require the significant exchange and disclosure of information and materials, including sensitive law enforcement records.

5. Therefore, the Parties request confirmation from the Court that the Scope of the Confidentiality Order extends to all documents and ESI produced or adduced in the course of implementing or demonstrating compliance with the terms of the Consent Decree.

6. Additionally, the Parties request confirmation that the Monitor and the Special Master will maintain all information designated as confidential pursuant to the Confidentiality Order in a confidential manner.

WHEREFORE, the Parties jointly and respectfully move the Court to enter an order confirming that (1) the Scope of the Confidentiality Order extends to all documents and ESI produced or adduced in the course of implementing or demonstrating compliance with the terms of the Consent Decree, and (2) the Monitor and the Special Master will maintain all information designated as confidential pursuant to the Confidentiality Order in a confidential manner.

Dated: April 25, 2019

Respectfully submitted,

The State of Illinois

The City of Chicago

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By: /s/ Allan T. Slagel

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